

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

LOCAL 705 INTERNATIONAL BROTHER-)
HOOD OF TEAMSTERS PENSION FUND, *et al.*,)
) CIVIL ACTION
Plaintiffs,)
) NO. 10 C 7743
vs.)
) JUDGE JOHN W. DARRAH
BERTEAU-LOWELL PLATING WORKS, INC.,)
an Illinois corporation,)
)
Defendant.)

MOTION FOR ENTRY OF DEFAULT AND JUDGMENT

NOW COME Plaintiffs, by their attorneys, and move for entry of judgment by default against Defendant, Berteau-Lowell Plating Works, Inc., an Illinois corporation, in the total amount of \$87,358.75, plus Plaintiffs' court costs and reasonable attorneys' fees in the amount of \$3,562.50.

On December 14, 2010, the Summons and Complaint was served on the Registered Agent (Docket No. 9). While an appearance has been filed on behalf of Defendant (Docket No.'s 7 & 8), no answer has been filed. As Defendant has failed to answer the Complaint, Plaintiffs respectfully request entry of default and judgment. In support of their motion, Plaintiffs are submitting the Affidavits of Jack Witt and Catherine M. Chapman.

/s/ Patrick N. Ryan

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CERTIFICATE OF SERVICE

The undersigned, an attorney of record, hereby certifies that on or before the hour of 5:00 p.m., this 19th day of October 2011, he caused to be electronically filed the foregoing document (Motion for Entry of Default and Judgment) with the Clerk of Court using the CM/ECF system, which will send notification of such filing to the following:

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